

**Federal Defenders
OF NEW YORK, INC.**

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October 16, 2020

VIA FACSIMILE

The Honorable Judge George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Sandra Maria De Oliveira Lindo
18 Cr. 782 (GBD)**

Honorable Judge Daniels:

I write with the consent of the Government to respectfully request that the Court extend the deadline for securing the Pembroke, Georgia property for Ms. Lindo's bond until Friday, November 16, 2020.

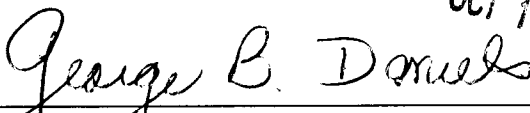
On October 7, 2020, Magistrate Judge Barbara C. Moses released Ms. Lindo on her own signature and imposed bail conditions, including: a \$300,000 personal recognizance bond, cosigned by two financially responsible persons, secured by her son's home in Pembroke, GA; travel restricted to SDNY/EDNY/N.D.Ga/S.D.Ga; surrender of all travel documents and no new applications; pretrial supervision as directed by Pretrial Services. Ms. Lindo's bail conditions were to be met by Wednesday, October 21, 2020. Since her release, Ms. Lindo has been compliant with her bail conditions and has reported to Pretrial as directed.

We respectfully ask for three more weeks to secure Ms. Lindo's son's property to the bond. The county in Georgia where the property is located requires that the Confession of Judgment needed to secure the property have "wet signatures" from the parties— here, the Government in New York and Ms. Lindo's son in Georgia. Additional time is therefore needed to secure wet signatures from both parties on the same original document. All other conditions have been met. The Government consents to this request.

Thank you for your consideration of this matter.

Respectfully submitted,
/s/
Zawadi Baharanyi
Assistant Federal Defender
(212) 417-8735

SO ORDERED:


HONORABLE GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

OCT 19 2020

cc: AUSA Stephanie Lake (by e-mail)